

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

Case No. 4:24cv3737

United States Courts
Southern District of Texas
FILED

ETON EMETOM
Plaintiff,

September 27, 2024

Nathan Ochsner, Clerk of Court

v.

CITY OF STAFFORD
and ****STAFFORD MUNICIPAL COURT****,
Defendants.

COMPLAINT FOR CIVIL RIGHTS VIOLATIONS

****1. PARTIES****

1.1. ****Plaintiff****: Eton Emetom, an individual residing at 2206 War Admiral Dr Stafford, TX.

1.2. ****Defendants****:

- City Of Stafford
 - Stafford Municipal Court, located at 2602 S Main St, Stafford, TX 77477, City of Stafford, Fort Bend County, Texas.
- Judge Debra Champagne, in her official and individual capacity, residing at 2602 S Main St, Stafford, TX 77477.
- Stafford Police Department

****2. JURISDICTION AND VENUE****

2.1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as it involves federal questions regarding violations of constitutional rights.

2.2. Venue is proper in this Court under 28 U.S.C. § 1391(b) because the events giving rise to the claims occurred in Fort Bend County, Texas.

****3. FACTUAL ALLEGATIONS****

3.1. On October 17, 2023, Plaintiff entered Stafford Municipal Court where Judge Debra Champagne and her deputies engaged in misconduct, including the abuse of power and improper use of authority. The Plaintiff was not familiar with the court's

jurisdiction or nature, and when questioned the court jurisdiction I was held under arrest.

3.2. Plaintiff requested a higher court such as; U.S Supreme Court and The United States District Court Southern District Of Texas, Houston Division review the case due to the lack of proven jurisdiction and refused to sign any agreements until jurisdiction was established. Despite this, I was falsely imprisoned upon Judge Champagne's orders, who stated, "HE DOES THIS ALL THE TIME."

3.3. Plaintiff was detained, coerced, and forced to sign a reset paper under duress and in handcuffs, despite lacking understanding of the court order. This conduct deprived me of due process, and my rights under the 4th, 6th, and 14th Amendments.

3.4. On January 29, 2024, Plaintiff inquired about three motions previously filed (Motion of Discovery, Motion To Dismiss, And Writ of Error) only to learn that they were denied without hearings, violating my right to due process and denying me information in my discovery. I was rescheduled for another date on April 29, 2024.

3.5. Plaintiff later received a notice of arrest for theft and failure to appear despite attending the scheduled appearance and having video proof that I was there. On July 25, 2024, I was stopped by Stafford Police Officer Deleon and arrested without being read my Miranda Rights and held for 48 hours for a false charge of Failure to appear, having no agreement or contracts with the court.

3.6. On August 6, 2024 Judge Champagne was practicing law behind the bench when I appeared back to court on a special appearance after being released from jail, The Judge made a plea for me of Not Guilty

and the Stafford Municipal Court have violated their oaths to uphold the Constitution, acting under color of law forcing statues and violations on me and using excessive force against me. This is unconstitutional and their actions on non judicial.

****4. CLAIMS FOR RELIEF****

4.1. Violation of Constitutional Rights: Defendants' actions violated my Civil Rights and failed to uphold the Constitution and their oath of offices and

4.2. Violation of Due Process: Defendants' actions deprived me of due process as guaranteed by the 5th and 14th Amendments.

4.3. False Imprisonment: Defendants unlawfully detained and arrested me without probable cause and proper legal jurisdiction or authority using excessive force,, after issuing a warrant for failure to appear even though I gave a special appearance in court that day and have video proof. I was held in Fort Bend County jail for 48hours on July 24 2024- July 26, 2024

4.4. Forced Contract Under Duress: I was coerced into signing documents by the Defendants using threat of violence under duress, violating principles of fairness and legality.

4.5. Deprivation of Rights Under Color of Law: Defendants acted under color of law in violation of Plaintiff's civil rights, depriving him of liberty and constitutional protections.

****5. DAMAGES****

5.1. As a result of Defendants' actions, Plaintiff has suffered significant emotional distress, financial loss, and harm to personal dignity.

5.2. Plaintiff seeks compensatory damages, punitive damages, and any other relief the Court deems appropriate, totaling \$600,000.

5.3. Declaratory Relief that the Defendants actions were unconstitutional, non judicial, unlawful and my rights were indeed violated.

5.4. Battery

****6. PRAYER FOR RELIEF****

WHEREFORE, Plaintiff respectfully requests that this Court:

6.1. Award Plaintiff \$600,000.00 in damages.

6.2. Grant any additional relief deemed just and proper.

****7. JURY DEMAND****

Plaintiff demands a trial by jury on all issues so triable.

Date: 09-25-2024

Respectfully submitted,

Eton Emetom
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[832-815-8496]
[Etonemetom@gmail.com]

Eton Emetom

9/25/2024